



March 6, 2014

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Attn: Wireline Competition Bureau

Re: WC Docket No. 10-90
Wamego Telecommunications Co., Inc.
Expression of Interest in Participating in Rural Broadband Experiment

Dear Ms. Dortch:

BACKGROUND

WTC Communications (WTC) is a rural Competitive Local Exchange Carrier (CLEC) and a wholly-owned subsidiary of Wamego Telecommunications Company, which is a rural Independent Local Exchange Carrier (ILEC) that has been in business since 1912. Both companies provide a full line of Voice, Internet and Video services to residential, government, education and commercial customers in four exchanges in Northeast Kansas. Our headquarters are in Wamego, Kansas, a city located 15 miles east of Manhattan and 40 miles west of Topeka (our state capital). We take pride in bringing affordable, state-of-the-art technologies to our customers and we serve the majority of our footprint with Fiber-to- the-Premise (FTTP) service.

WTC provides Internet bandwidth speeds from 1MB to 100MB, plus up to a Gigabyte connection to each of our anchor institutions.

Unfortunately, we have numerous rural high-cost areas adjacent to our footprint that are either unserved, underserved or the anchor institutions cannot receive adequate Internet bandwidth.

PROPOSED RURAL BROADBAND TECHNOLOGY TRIAL

Per Attachment A, WTC is proposing to build five towers and deploy fiber to each tower to offer Fixed Wireless Internet service. The towers will be located in the following areas – (1) an unserved area in rural Pottawatomie County (Census Tract 20149000100) (2) an unserved/underserved area in rural Wabaunsee County – outside of Alma (Census Tract 20197483100) (3) an unserved community - City of McFarland (Census Tract 20197483100) (4) an underserved area in rural Wabaunsee County – outside of Maple Hill (Census Tract 20197483100) and (5) an underserved area in rural Shawnee County – outside of Rossville (Census Tract 20177003500).

These five towers would offer Internet services to 460+ unserved homes/businesses and 650+ underserved homes/businesses.

WTC would offer the following Internet bandwidth download speeds - 3MB, 6MB, 10MB, 15MB and 25MB. All Internet bandwidth upload speeds would be 1MB or higher. Plus, WTC would offer a Voice/Telephone service as a bundled option.

Additionally, WTC will leverage the fiber deployment to the towers to connect twenty-nine anchor institutions with fiber in four communities - Alma, McFarland, Maple Hill and Rossville – and provide them up to a Gigabyte connection at each location. With this project, WTC would build sixty-four miles of fiber.

WTC feels this is an outstanding rural broadband technology trial for the following reasons – (1) WTC will deploy fiber to the towers and anchor institutions to allow for increased capacity of bandwidth needed for the foreseeable future (2) the fiber deployment will ensure high-quality stable connectivity to the towers and anchor institutions (3) the fixed wireless service will allow for a cost-effective way to serve high-cost rural customers with up to 25MB of bandwidth (4) the fixed wireless service will be upgradable, at reasonable costs, in the future to allow for increased bandwidth and better coverage and (5) WTC will minimize the overall costs of the project by using our current infrastructure to extend the access to these remote rural locations.

GEOGRAPHIC TERRITORY

Our proposed rural broadband trial will provide service to high-cost locations within the following census tracts –

- 20149000100
- 20197483100
- 20177003500

Per Attachment B, all three of the above census tracts are in the list of census tracts, released by the Wireline Competition Bureau, in price cap areas potentially suitable for such rural experiments.

LIST OF ANCHOR INSTITUTIONS

Anchor Institutions would include but not necessarily be limited to the following -

- (1) Alma, KS - USD 329 Mill Creek Valley District Office, Wabaunsee High School, Alma Grade School, St. John Lutheran School, Pottawatomie-Wabaunsee Regional Library, Alma City Hall, Alma Police Department, Alma Fire Station - Wabaunsee County Fire Department, Cotton-O'Neil Clinic, Wabaunsee County Sheriff's Office, Wabaunsee County Courthouse and U.S. Postal Service
- (2) McFarland, KS – McFarland City Hall, McFarland Fire Station - Wabaunsee County Fire Department and U.S. Postal Service
- (3) Maple Hill, KS - Maple Hill Grade School, Maple Hill City Office, Maple Hill Police Department, Maple Hill Fire Station - Wabaunsee County Fire Department and U.S. Postal Service
- (4) Rossville, KS - Rossville Grade School, Rossville Jr/Sr High School, Rossville City Hall, Rossville Police Department, Rossville Fire Station – Shawnee County Fire District #3, Rossville Community Library, Cotton-O'Neil Clinic and U.S. Postal Service

EXISTING PROVIDERS

CenturyLink provides DSL services in the Alma and Rossville areas. In the city limits of Alma, the highest Internet bandwidth is 10MB and in the city limits of Rossville, the highest Internet bandwidth is 25MB.

AT&T provides DSL services in the Maple Hill area. In the city limits of Maple Hill, the highest Internet bandwidth is 10MB.

While there is adequate Internet bandwidth available for today's needs of residents and small businesses, these Internet bandwidths do not meet the current and/or future needs of large businesses or anchor institutions in these three communities.

There is a company that provides Fixed Wireless Internet services in the rural areas around Maple Hill and Rossville. The current coverage is marginal and the company does not offer any service above 6MB.

WTC views the rural areas around Maple Hill and Rossville as underserved and we will provide improved coverage and up to 25MB of service.

ELIGIBLE TELECOMMUNICATION CARRIER

At this time, WTC does not have an Eligible Telecommunication Carrier (ETC) designation with the Kansas Corporation Commission (KCC). If WTC is awarded funding we would prepare the necessary regulatory filings and meet the requirements set forth by the KCC and the FCC.

PROJECT TIMELINE

WTC expects to complete this project within twelve months of notice of funding with our initial focus on deployment of services to the unserved areas.

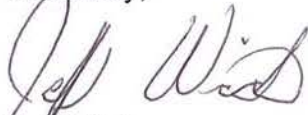
FUNDING

WTC is requesting one-time upfront funding only as we will be able to adequately provide on-going services and upgrades per revenues collected from customers.

WTC estimates the total cost of the project at \$3,300,000 and requests an investment from the FCC Connect America Fund of \$2,970,000 with WTC providing an investment of \$330,000.

WTC appreciates the opportunity to provide this non-binding expression of interest.

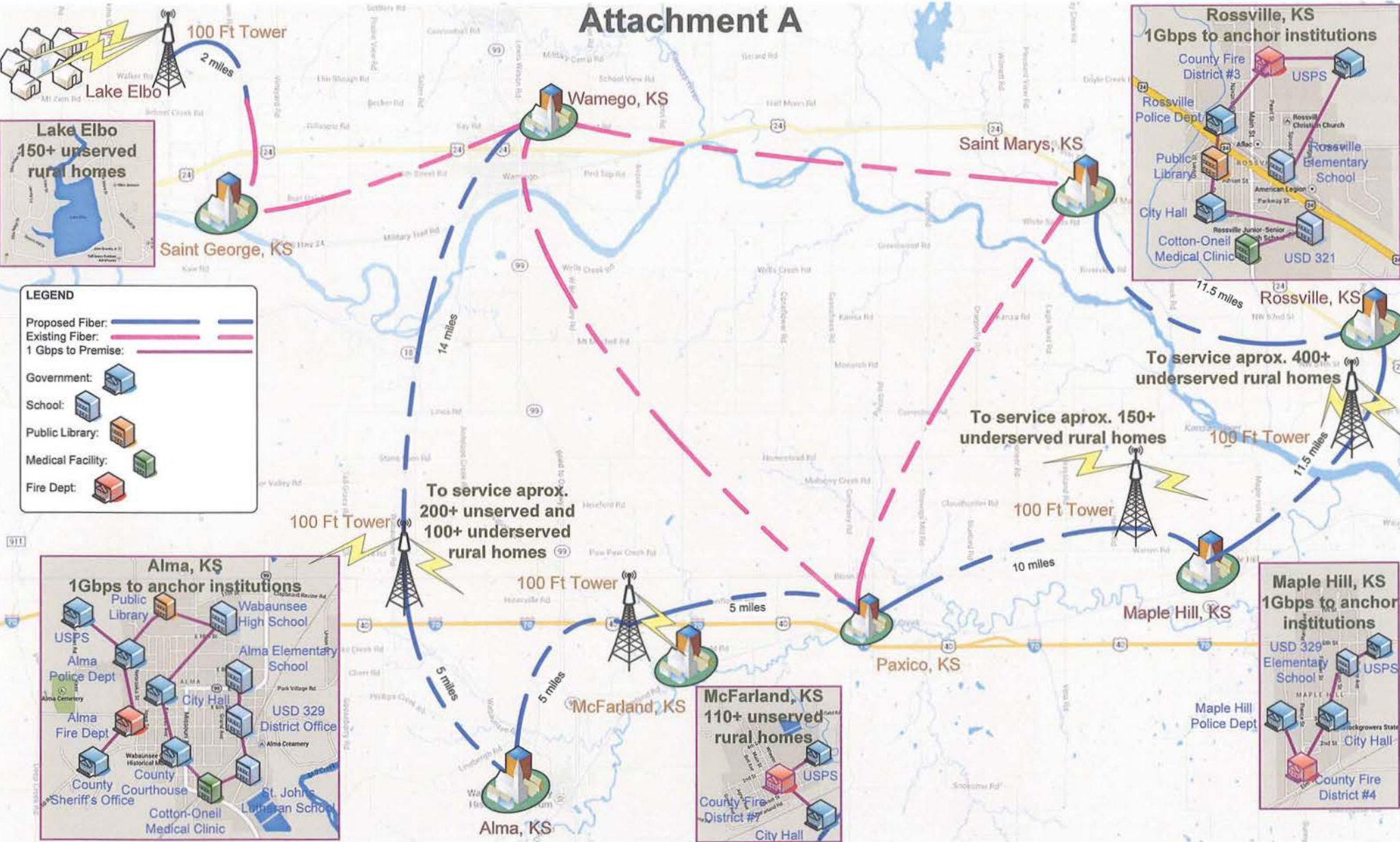
Sincerely,



Jeff Wick
General Manager

(jwick@wtcks.com)

Attachment A



ATTACHMENT B

<u>State</u>	<u>County</u>	<u>County Name</u>	<u>Tract ID</u>	<u>Eligible High-Cost Locations</u>	<u>Extremely High-Cost Locations</u>	<u>Annual Support</u>
KS	20149	Pottawatomie	20149000100	94	15	\$58,511.47
KS	20197	Wabaunsee	20197483100	306	99	\$216,779.56
KS	20177	Shawnee	20177003500	156	18	\$84,042.89